

FILED

APR 29 2021

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO.: 1:20CR392
Plaintiff,) JUDGE SOLOMON OLIVER, JR.
v.)
CHARLES VACCARO,) <u>MOTION TO SEAL INDICTMENT</u>
DROR SVORAI,)
DENNIS RUGGERI,)
KEVIN HAGEN,)
GARY BERLLY,)
YOSEF BITON,)
Defendants.)

Now comes the United States of America, by and through counsel, Brad J. Beeson, Assistant United States Attorney, and respectfully moves this Court for an order sealing the attached indictment for the following reason(s): Flight risk.

The government further requests this Court to order that an Assistant United States Attorney of the Criminal Division of the United States Attorney's Office for the Northern District of Ohio may obtain, upon request, a certified copy of this indictment should the defendant be

located in another judicial district and a certified copy of this indictment is needed for forwarding to that judicial district. See Rule 6(e)(4) of the Federal Rules of Criminal Procedure.

Respectfully submitted,

VIPAL J. PATEL
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By:



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